

# **EXHIBIT 15**

## **Excerpts from Deposition of Javier Vazquez**

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch,) Case No: 2:15-cv-01045-RFB(PAL)  
Brandon Vera, Luis Javier Vazquez,)  
and Kyle Kingsbury on behalf of )  
themselves and all others )  
similarly situated, )  
)  
Plaintiffs, )  
)  
vs. )  
)  
Zuffa, LLC, d/b/a Ultimate )  
Fighting Championship and UFC, )  
)  
)  
Defendants. )

VIDEO DEPOSITION OF JAVIER VASQUEZ  
taken at, Boies, Schiller & Flexner,  
300 South Fourth Street, Suite 800,  
Las Vegas, Nevada 89101 beginning at 9:15 A.M.  
and ending at 3:46 P.M.on Wednesday, February 14, 2017

Reported by:  
Sarah Padilla, CCR NO. 929  
Job No. 296624 Pages 1-205

1 A Matt Serra.  
 2 Q At the time, would you have considered  
 3 Matt Serra an elite MMA fighter?  
 4 MR. DELL'ANGELO: Object to the form to  
 5 the extent it calls for a legal conclusion.  
 6 THE WITNESS: I believe that Matt Serra  
 7 was a very good fighter, yes. Elite, I would say  
 8 so, yes.  
 9 BY MR. McSWEENEY:  
 10 Q Do you recall who Matt Serra ultimately  
 11 fought in UFC 46?  
 12 MR. DELL'ANGELO: Object to the form.  
 13 Foundation.  
 14 THE WITNESS: I believe so, but I wouldn't  
 15 bet my whole house on it.  
 16 BY MR. McSWEENEY:  
 17 Q Fair enough. But who is it you believe  
 18 Matt Serra fought?  
 19 A I believe he fought Rich Crunkilton.  
 20 Q Well, good thing you didn't bet.  
 21 A I didn't bet.  
 22 Q I'm saying good thing you didn't bet your  
 23 house.  
 24 A Who was it?  
 25 Q Jeff Curran?

1 A Curran, there you go.  
 2 Q At the time, would have been believed Jeff  
 3 Curran be an elite MMA fighter?  
 4 A Yes, I believe so.  
 5 Q Do you recall the outcome of the fight  
 6 between Jeff Curran and Matt Serra at UFC 46?  
 7 A I believe so. I believe so.  
 8 Q Do you recall that Jeff Curran lost to  
 9 Matt Serra?  
 10 A Yes. That's what I remember.  
 11 Q Despite his loss to Matt Serra at UFC 46,  
 12 would you still have considered Jeff Curran an elite  
 13 MMA fighter?  
 14 MR. DELL'ANGELO: Object to the form to  
 15 the extent it calls for a legal conclusion.  
 16 THE WITNESS: Yes.  
 17 BY MR. McSWEENEY:  
 18 Q Returning to the paragraph at the bottom,  
 19 the second to the last paragraph on this page, you  
 20 go on to say "With respect to talks with UFC, we  
 21 were talking to them (UFC). They had offered me a  
 22 potential fight with a couple of people, and it just  
 23 wasn't the right time. I got offered the fight with  
 24 Din Thomas, who is a really good fighter, but it  
 25 just wasn't the right time." Do you see that?

1 A Yes.  
 2 Q Do you recall why it wasn't the right time  
 3 for you to accept the fights offered by UFC?  
 4 A I would be speculating because I don't  
 5 remember the exact, but I have an idea of what it  
 6 might have been.  
 7 Q And what's that idea?  
 8 A I believe I hadn't recovered from my knee  
 9 yet. I didn't feel comfortable with it yet, I don't  
 10 think.  
 11 Q Are you referring to injuries you  
 12 sustained in your fight with Alberto Crane?  
 13 A I have had multiple.  
 14 Q Fair enough. You say that UFC offered you  
 15 a potential fight with a couple of people. Do you  
 16 recall who those people were?  
 17 A I don't.  
 18 Q Do you recall how many people?  
 19 A I do not.  
 20 Q You mentioned specifically that you were  
 21 offered a fight with Din Thomas who you described as  
 22 a really good fighter. At the time, would you have  
 23 regarded Din Thomas as an elite MMA fighter?  
 24 MR. DELL'ANGELO: Object to the form to  
 25 the extent it calls for a legal conclusion.

1 THE WITNESS: In my opinion, Din is -- is  
 2 very, very good. He was top of the top bracket, so,  
 3 yes.  
 4 BY MR. McSWEENEY:  
 5 Q Ultimately, you signed with WEC in 2009;  
 6 correct?  
 7 A Yes.  
 8 Q Do you recall when you first came in  
 9 contact with Zuffa regarding a possible contract?  
 10 MR. DELL'ANGELO: Object to the form.  
 11 Vague.  
 12 THE WITNESS: Yeah. I remember talking to  
 13 them. I don't remember the time frame.  
 14 BY MR. McSWEENEY:  
 15 Q Do you remember who initiated contact  
 16 between you and Zuffa?  
 17 A I do not.  
 18 Q Did anyone assist you in contacting Zuffa?  
 19 A I don't remember if they contacted me or  
 20 we contacted them. I honestly don't remember.  
 21 Q Did you have a manager working on your  
 22 behalf at that point?  
 23 MR. DELL'ANGELO: Object to the form.  
 24 Vague as to time.  
 25 THE WITNESS: Repeat the question. It

1 wasn't clear.

2 BY MR. McSWEENEY:

3 Q Sure. When you were in contact with Zuffa  
4 prior to -- immediately prior to your fight with LC  
5 Davis, were you represented by a manager?

6 A Yes.

7 Q And who was that?

8 A My wife.

9 Q Mr. Aram had no role in contacting Zuffa,  
10 to your recollection?

11 MR. DELL'ANGELO: Object to the form.  
12 Misstates the witness's testimony.

13 THE WITNESS: I -- I don't recall. I know  
14 my wife was there the whole time. There was a  
15 period during that time when Mr. Aram eventually  
16 wasn't doing anything else for us. I don't remember  
17 when that time was.

18 BY MR. McSWEENEY:

19 Q Fair enough. Do you recall why you wanted  
20 to fight in the WEC?

21 MR. DELL'ANGELO: Object to the form.  
22 Foundation.

23 THE WITNESS: I do.

24 BY MR. McSWEENEY:

25 Q And why is that?

1 A At the time I wanted to compete against  
2 what was looked at as -- as the top guys.

3 Q In the time period when you were  
4 considering joining WEC immediately before your  
5 fight with LC Davis, did you consider joining any  
6 competing promotions?

7 MR. DELL'ANGELO: Object to the form to  
8 the extent it calls for a legal conclusion.

9 THE WITNESS: One more time, please.

10 BY MR. McSWEENEY:

11 Q Sure. When you were considering whether  
12 to sign a contract with WEC before your fight with  
13 LC Davis, were you considering the possibility of  
14 signing a contract with, for instance, Strike Force?

15 A I was open to a possibility, but the WEC  
16 had my weight class, which is very important, and  
17 they had the top guys. I don't even know if Strike  
18 Force had my weight class.

19 Q Did you investigate the possibility of  
20 joining any other promotion beside WEC at this time  
21 period?

22 A Again, because of the time frame, it was  
23 very limited for that weight class. So I believe at  
24 the time the WEC had the weight class, which was  
25 problem No. 1. And then problem No. 2 that they had

1 elite guys at that weight class, so.

2 Q So is it your recollection that there --  
3 that competing promotions did not have elite  
4 fighters at your weight class?

5 A No.

6 MR. DELL'ANGELO: Object to the form to  
7 the extent it calls for a legal conclusion.

8 THE WITNESS: That's not what I said.  
9 What I said was there was no weight classes with  
10 elite fighters at that time anywhere other than the  
11 WEC. I don't believe so. If there were other  
12 organizations with elite fighters, I was not privy  
13 to that information at that time.

14 BY MR. McSWEENEY:

15 Q What do you mean by weight class?

16 A MMA fights are conducted in weight  
17 divisions. So a guy who's 200-pounds isn't going to  
18 fight a guy who's 140-pounds.

19 Q And at this time what was your --

20 A At that time. At that time. Before, yes,  
21 but during this era, because we've gone through  
22 eras. During this era, weight classes were  
23 established as well as regulation.

24 Q And at this time when you were considering  
25 the possibility of joining WEC immediately before

1 your fight with LC Davis, what was your weight  
2 class?

3 A My weight class was 145 pounds.

4 Q Is there a common name for that weight  
5 class?

6 A Yes.

7 Q What is that?

8 A Featherweight.

9 Q Do you recall whether at the time you were  
10 considering joining WEC, featherweight was the  
11 lightest weight class in WEC?

12 A One more time. I want to make sure I  
13 answer the correct question.

14 Q Sure. Maybe I can phrase it a little more  
15 clearly.

16 At that time, was featherweight the  
17 lightest class that WEC offered?

18 A No.

19 Q Do you recall what the lightest weight  
20 class was?

21 A Yes.

22 Q What was that?

23 A Bantamweight. I believe it was  
24 bantamweight.

25 Q And to your recollection, competing

<p style="text-align: right;">Page 42</p> <p>1 promotions such as Strike Force did not have 2 featherweight classes?</p> <p>3 MR. DELL'ANGELO: Object to the form. 4 Vague.</p> <p>5 THE WITNESS: I don't believe so. I don't 6 believe so.</p> <p>7 BY MR. McSWEENEY:</p> <p>8 Q Do you recall at that time what promotions 9 did have featherweight classes?</p> <p>10 MR. DELL'ANGELO: Object to the form. 11 Vague.</p> <p>12 THE WITNESS: I do not.</p> <p>13 BY MR. McSWEENEY:</p> <p>14 Q Can you name any other promotions beside 15 WEC that had featherweight class at that time?</p> <p>16 MR. DELL'ANGELO: Object to the form. 17 Vague.</p> <p>18 THE WITNESS: What was the -- what was the 19 time frame?</p> <p>20 BY MR. McSWEENEY:</p> <p>21 Q When you were considering joining WEC in 22 2009, immediately before your fight with LC Davis?</p> <p>23 A It's a difficult question. It's a 24 difficult question. Promoters can make up fights in 25 any weight class. But having a division, a group of</p>	<p style="text-align: right;">Page 44</p> <p>1 speculation. You can answer.</p> <p>2 THE WITNESS: Again, tricky. Tricky 3 question because in theory, I probably could have. 4 But the size -- it wouldn't have been advantageous 5 for me to do so.</p> <p>6 BY MR. McSWEENEY:</p> <p>7 Q You testified earlier that WEC had lighter 8 weight classes than featherweight. Do you recall 9 that?</p> <p>10 A Yes.</p> <p>11 Q Could you, in this time period that we've 12 been discussing, have fought in a lighter weight 13 class?</p> <p>14 A No.</p> <p>15 Q Why not?</p> <p>16 A Because I didn't want to die making 17 weight.</p> <p>18 Q Did you consider joining other promotions 19 besides WEC in a higher weight class at this time?</p> <p>20 A At that -- in that era, I was not 21 interested in fighting in a higher weight class.</p> <p>22 Q Can we return to the complaint, I think it 23 was the first Exhibit No. 37, if my recollection is 24 correct. Can you turn to page 13 of the complaint. 25 Pardon me. I think it is actually page 10. My</p>
<p style="text-align: right;">Page 43</p> <p>1 elite individuals, is a different thing. So for 2 example I can get offered a fight anywhere at a 3 weight class or maybe at a catch weight. But that's 4 not the same thing as being in a promotion that is 5 grouping the top guys and putting them against each 6 other. So you can get fights maybe, maybe not, 7 depending. But at that time the focal weight 8 classes were 155 and up.</p> <p>9 Q And you used the term "catch weight" in 10 that response. Can you explain what that is?</p> <p>11 A A catch weight is basically a fight 12 between two individuals on an agreed weight. They 13 agree on a weight that doesn't necessarily have to 14 fall into a particular weight class.</p> <p>15 Q Are you able -- strike that.</p> <p>16 Could you have fought in a higher weight 17 class?</p> <p>18 MR. DELL'ANGELO: Object to the form. 19 Vague as to time.</p> <p>20 BY MR. McSWEENEY:</p> <p>21 Q In the time period we've been discussing, 22 2009, when you are considering whether to join WEC 23 prior to your fight with LC Davis, could you have 24 fought in a higher weight class?</p> <p>25 MR. DELL'ANGELO: Objection. Calls for</p>	<p style="text-align: right;">Page 45</p> <p>1 mistake.</p> <p>2 Do you see on page 10 below the heading 3 definitions there is a subparagraph D, elite 4 professional MMA fighter. Do you see that?</p> <p>5 A Yes.</p> <p>6 Q It reads "Elite Professional MMA fighter 7 means any professional MMA fighter who has 8 demonstrated success through competition in local 9 and/or regional MMA promotions or who has developed 10 significant public notoriety amongst MMA industry 11 media and the consuming audience through success in 12 athletic competition. All UFC fighters are elite 13 professional MMA fighters." Do you see that?</p> <p>14 A Yes.</p> <p>15 Q Do you agree with that definition of elite 16 professional MMA fighter?</p> <p>17 MR. DELL'ANGELO: Object to the form to 18 the extent it calls for a legal conclusion. You can 19 answer.</p> <p>20 THE WITNESS: During what time frame?</p> <p>21 BY MR. McSWEENEY:</p> <p>22 Q During the time frame -- if you look up 23 from that paragraph, you'll see a definition, 24 subparagraph C, class period. Class period reads -- 25 "means the period from December 16, 2010, until the</p>

1 Q Did you regard yourself as the best  
 2 Pancrase fighter in 1998 when you lost to Victor  
 3 Hunsaker?

4 A That wasn't even -- I just looked at the  
 5 people right in front of me, tried to get through  
 6 them. At the time, information wasn't as easily for  
 7 accessibility.

8 Q Uh-huh.

9 A -- for the Pancrase rankings. I don't  
 10 even know what the rankings Pancrase rankings were  
 11 at the time. So we just basically used a rule set.

12 Q Had there been rankings, would you have  
 13 relied on them to determine whether you were the  
 14 best Pancrase fighter?

15 MR. McSWEENEY: Object to the form. Calls  
 16 for speculation.

17 THE WITNESS: I don't know, man. At the  
 18 time I don't even think -- I don't even know what  
 19 was going on with rankings back then. I have no  
 20 clue. It was early in the sport, so.

21 BY MR. McSWEENEY:

22 Q Did you regard yourself as better than  
 23 Victor Hunsaker after having lost to him in 1998?

24 A After losing to him, did I think I was  
 25 better?

1 Q Uh-huh.

2 A I know I was better.

3 Q Uh-huh. I see. Do you regard yourself  
 4 today as an elite MMA fighter?

5 MR. DELL'ANGELO: Object to the form to  
 6 the extent it calls for a legal conclusion.

7 THE WITNESS: I'm not an MMA fighter  
 8 currently.

9 BY MR. McSWEENEY:

10 Q So you do not consider yourself an elite  
 11 MMA fighter?

12 A I'm not an MMA fighter right now  
 13 currently. So it's like do you consider yourself  
 14 the best lawyer? Well, I'm not even practicing law  
 15 anymore. Well, do you consider yourself the best  
 16 lawyer? It's like, dude, I'm not even doing it.

17 Q Uh-huh.

18 A So I don't know.

19 Q So you don't have an opinion on whether  
 20 you're the --

21 A I don't care. It's not what I'm into.  
 22 It's not what I'm doing. It's not my focus in my  
 23 life.

24 Q Uh-huh.

25 A When I was focused at it, I thought I was

1 the best. That's not my focus right now.

2 Q So is it the case that you ceased being an  
 3 elite MMA fighter when you retired from professional  
 4 MMA fighting?

5 MR. MAYSEY: Object to the form.  
 6 Misstates testimony.

7 THE WITNESS: If -- how can you be  
 8 considered an elite MMA fighter if you're not  
 9 fighting?

10 BY MR. McSWEENEY:

11 Q So did you cease becoming -- pardon me --  
 12 strike that.

13 Did you cease being an elite MMA fighter  
 14 the moment you -- or, pardon me -- the moment after  
 15 you won against Joe Stevenson on June 26, 2011?

16 A I mean, maybe -- maybe your definition and  
 17 my definition are different.

18 Q Uh-huh?

19 A Doesn't matter -- I mean, in my opinion,  
 20 once you're done fighting, you're done fighting.  
 21 Like doesn't matter what you think, doesn't matter  
 22 what anybody else thinks, the skill set I have, the  
 23 following I have, I have, but I'm not trying to  
 24 fight.

25 Q Yeah.

1 A So I mean, it's not like you can just  
 2 erase the data. So I'm not exactly sure what you're  
 3 asking. I mean, if I was fighting, do I still think  
 4 I'm great, yeah. But I'm not fighting, so it  
 5 doesn't matter.

6 Q When did you cease being an MMA fighter?

7 A I think -- excuse me. I believe it was  
 8 after my last fight.

9 Q How soon after your last fight did you  
 10 cease being an MMA fighter?

11 A After my last fight. I didn't fight after  
 12 that, so the second -- I mean, I'm not exactly sure  
 13 what you mean. I mean, if you're -- if you're an  
 14 MMA fighter, you're fighting. You have a contract,  
 15 you have -- I mean, I think once you decide to stop  
 16 fighting, it doesn't mean that your level drops or  
 17 anything like that, it just -- you just stop  
 18 fighting. So I don't understand the question. I  
 19 mean --

20 Q When did you stop fighting?

21 A 2011, I believe, like June, somewhere  
 22 around that time frame.

23 MR. McSWEENEY: I've been keeping an eye  
 24 on the elevator because I believe lunch is coming,  
 25 and though I haven't seen it, rather than start a

1 new line of questioning, maybe we should just break  
2 and --

3 THE WITNESS: Yeah.

4 MR. McSWEENEY: -- grab and bite and we  
5 can all return?

6 THE WITNESS: Sure.

7 THE VIDEOGRAPHER: We are now going off  
8 the record. The time is now approximately 12:09  
9 P.M.

10 (A lunch recess was taken.)

11 THE VIDEOGRAPHER: We are now back on the  
12 record. The time is approximately 1:09 P.M.

13 BY MR. McSWEENEY:

14 Q Welcome back. Before the break,  
15 Mr. Vazquez I think I heard you say that you are no  
16 longer an elite MMA fighter because you are, in  
17 fact, no longer an MMA fighter; is that correct?

18 A Basically.

19 Q And you said before the break also that  
20 you stopped being an MMA fighter after your final  
21 fight in 2011; right?

22 A Yes.

23 Q When after your last fight in 2011 did you  
24 stop being an MMA fighter?

25 A I don't remember the exact date.

1 Q Was it immediately after the fight in  
2 2011?

3 A No. No.

4 Q How long after the fight in 2011 would you  
5 say it was?

6 A I was deliberating for I would say at  
7 least two or three months.

8 Q Two or three months?

9 A Maybe more, but I don't remember.

10 Q A couple?

11 A Yeah. You know, it's a career change.  
12 Just took my time. There was no rush.

13 Q And after two or three months or whatever  
14 the period was, you decided that you were no longer  
15 going to fight professionally; is that correct?

16 A Yes.

17 Q And why did you decide that you were no  
18 longer going to fight professionally?

19 A There were several reasons.

20 Q And what were those reasons?

21 A One of them was a summit that the UFC  
22 wanted me to attend, which I didn't feel -- which I  
23 didn't mind attending, but there -- you're kind of  
24 just forced into doing it. You have no say so in  
it.

1 Another one was the pay, you know, for me  
2 to achieve the kind of pay that I was willing to,  
3 would have probably taken, you know, more time than  
4 I wanted to put into it, basically.

5 Q Were there any other reasons?

6 A I'm sure there were. I mean, you know,  
7 I'm not thinking of them off the top of my head  
8 right now. But you know, I'd been doing it for 13  
9 years.

10 Q So you -- the two reasons, the two  
11 specific reasons you mentioned were the summit and  
12 that you felt forced you had to do, and that for you  
13 to achieve the kind of pay that you were -- it would  
14 have taken you more time than you wanted to put into  
15 it. Can you elaborate on the second reason?

16 A You know, we have a contract, you know.  
17 There's -- there's no real renegotiation, anything  
18 like that. So you sign for what you sign for. And  
19 for me, the idea was, I don't mind fighting the top  
20 guys, but what I wanted to do was get compensated  
21 for fighting the top guys. If you want to keep  
22 feeding me these guys that are, you know, not  
23 guiding me towards my ultimate goal, which is a  
24 title shot and all these things, then, you know.  
25 These training camps that we go through are very

1 difficult physically, emotionally, psychologically,  
2 so there's wear and tear that I didn't feel that I  
3 was compensated enough to be putting my body through  
4 the kind of wear and tear, even though, you know --  
5 I felt like I was wasting my time basically. The  
6 squeeze wasn't worth the juice.

7 Q How much more time would it have taken in  
8 terms of pay for it to be worthwhile?

9 A Substantial.

10 Q Can you estimate what substantial would  
11 mean?

12 A I mean, for the time -- this is my  
13 opinion. For the time that I've put in and the  
14 things that I've shown over the years, at least six  
15 figures.

16 Q And is that six figures for an annual  
17 salary or is it --

18 A Per fight.

19 Q -- per fight?

20 A Per fight.

21 Q Returning to the other reason you gave,  
22 which was the summit that you felt forced to attend,  
23 can you explain what it is that -- what the summit  
24 is?

25 A To be honest, I really don't know what the

<p style="text-align: right;">Page 114</p> <p>1 summit is. We did one the previous year. They      2 educated us on social media, etiquette, you know,      3 basically fighter conduct, things of that nature.      4 What you should and shouldn't on social media,      5 things of that nature. How you should promote      6 yourself, create corporations, how to run your      7 career like a business, organizing you a little bit      8 more.</p> <p>9 Q And what specifically about this -- pardon      10 me. Let me back up.</p> <p>11 You testified that you attended at least      12 one summit.</p> <p>13 A Uh-huh.</p> <p>14 Q Do you recall attending any other summits,      15 or was it just the one?</p> <p>16 A I attended just the one.</p> <p>17 Q And is it the case that you were then      18 asked to attend another summit and you declined?</p> <p>19 A Yes.</p> <p>20 Q So at some time after declining to attend      21 this second summit is when you decided you would no      22 longer fight professionally; is that correct?</p> <p>23 A Yeah. I was -- you know, that happened      24 and then I had some surgeries, my hand, my knee. So      25 that was all -- I don't remember the exact timeline,</p>	<p style="text-align: right;">Page 116</p> <p>1 THE WITNESS: Did I curse?      2 BY MR. McSWEENEY:      3 Q That's okay.      4 A Sorry.      5 Q I'm not offended.      6 Can we get tab 87?      7 A I don't even know when I did it.      8 Q That's fine.      9 The court reporter is going to hand you      10 what's been marked as Exhibit 45.      11 Sorry. Need one over here too.      12 (Exhibit 45 was marked.)</p> <p>13 BY MR. McSWEENEY:      14 Q This is a document Bates stamped      15 Le-Plaintiffs-0184254. Can you just take a moment      16 to review it quickly, or however much time you need.      17 Have you had an opportunity to read it?      18 A Just a second, please.      19 Q Sure.</p> <p>20 MR. DELL'ANGELO: Counsel, could I confer      21 with the witness to make an assessment as to whether      22 or not any portion of this is privileged. Based on      23 the contents, I'm concerned that it may be.      24 MR. McSWEENEY: What portion do you      25 believe to be privileged?</p>
<p style="text-align: right;">Page 115</p> <p>1 but, yeah, that was all part of the ultimate      2 decision.</p> <p>3 Q Do you remember roughly when the summit      4 that you declined to attend took place?</p> <p>5 A No, I have no idea.</p> <p>6 Q Do you have a rough idea at least in year?</p> <p>7 A No.</p> <p>8 Q Sometime after your last fight?</p> <p>9 A Sometime after my last fight.</p> <p>10 Q Since that time when you decided you were      11 no longer going to fight professionally, have you      12 ever changed your mind?</p> <p>13 A No.</p> <p>14 Q You've never thought -- you've never felt      15 the urge to return to the octagon or whatever the      16 shape of the fighting arena may be, professionally?</p> <p>17 A See, there's two things to fighting.      There's fighting, and then there's the camp. The      camp sucks. Fighting, just go out and fight, like,      that's easy. It's the 12 weeks prior. So any time      I would think, yeah, I want to go back. Fuck that,      I don't want to go through a camp. That's what it      is. Fighting itself is easy.</p> <p>18 Q That's fine.</p> <p>19 MR. DELL'ANGELO: Curse word.</p>	<p style="text-align: right;">Page 117</p> <p>1 MR. DELL'ANGELO: That's why I want to      2 consult with my client.</p> <p>3 MR. WIDNELL: Can you identify who the      4 attorney would be?</p> <p>5 MR. McSWEENEY: Or the legal matter being      6 discussed?</p> <p>7 MR. DELL'ANGELO: Well, if you look at the      8 subject line, that may give you some indication.</p> <p>9 MR. McSWEENEY: Can you identify what      10 about the subject line you believe to be privileged?      11 Are we looking at the same document?</p> <p>12 MR. DELL'ANGELO: I don't know. Are we?</p> <p>13 MR. McSWEENEY: Bates stamped      14 Le-Plaintiffs-0184254?</p> <p>15 MR. DELL'ANGELO: No.</p> <p>16 MR. McSWEENEY: Well, we were given --      17 we've given you the wrong -- tab 87.</p> <p>18 MR. DELL'ANGELO: I was --</p> <p>19 MR. McSWEENEY: That resolves that.</p> <p>20 MR. DELL'ANGELO: I know you're a tough      21 advocate, but if you couldn't figure that one, I      22 wasn't sure how we couldn't be on the same page.</p> <p>23 MR. McSWEENEY: Sure. Sorry there seems      24 to be an error in our file keeping.</p> <p>25 MR. DELL'ANGELO: It is okay.</p>

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1 My memory's a little bit foggy. So we got here  
 2 yesterday. Yesterday was Sunday; right? Or  
 3 yesterday was Monday? No, yesterday was Monday.

4 Q Yesterday was Monday. It's a little foggy  
 5 was well?

6 A Yeah. I don't know. Yesterday we got  
 7 here and we went to go eat. I don't know what to  
 8 tell you. We got here and went to go eat.  
 9 Honestly, I don't remember what we talked about at  
 10 that time. I'm not even kidding.

11 Q Why don't we take a short break. We'll  
 12 review where we are, and that should probably be  
 13 close to the end.

14 THE VIDEOGRAPHER: We are now going off  
 15 the record. The time is approximately 3:39 P.M.

16 (A short recess was taken.)

17 THE VIDEOGRAPHER: We are back on the  
 18 record. The time is approximately 3:45 P.M.

19 BY MR. McSWEENEY:

20 Q Mr. Vazquez, are you aware of something  
 21 called MMAAA?

22 A Yes.

23 Q And can you tell me what your  
 24 understanding of what the MMAAA is?

25 A I have no clue, to be honest with you. I

1 CERTIFICATE OF WITNESS  
 2 PAGE LINE CHANGE REASON  
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21 I, Javier Vazquez, witness herein, do hereby  
 22 certify and declare under penalty of perjury the within  
 23 and foregoing transcription to be my deposition in said  
 24 action; that I have read, corrected and do hereby affix  
 my signature to said deposition.

25 Javier Vazquez

Witness Date

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1 don't know what they're doing. They're supposed to  
 2 be another fighter organization, not organization,  
 3 like an association. I have no clue what the heck  
 4 they're doing.

5 Q So I take it you have no involvement in  
 6 the MMAAA?

7 A No.

8 Q Do you have any understanding of how their  
 9 aims may differ from the MMAFA?

10 A No.

11 MR. McSWEENEY: No further questions.

12 MR. DELL'ANGELO: Okay. Thank you. We'll  
 13 read and sign.

14 MR. McSWEENEY: Okay.

15 MR. DELL'ANGELO: I guess just, while  
 16 we're here, pursuant to the protective order, we're  
 17 going to claw back lead Plaintiffs 0175299. Is that  
 18 exhibit that I think you inadvertently handed out as  
 19 45 or 48 or whatever it was? We'll get you a letter  
 20 on that.

21 MR. McSWEENEY: We'll look forward to it.

22 THE VIDEOGRAPHER: This concludes the  
 23 video deposition of Javier Vazquez. We are now  
 24 going off the record. The time is 3:46 P.M.

25 (TIME NOTED: 3:46 P.M.)

1 STATE OF NEVADA)  
 2 ) ss  
 3 COUNTY OF CLARK)

4 I, Sarah Padilla, a duly commissioned and  
 5 licensed court reporter, Clark County, State of Nevada,  
 6 do hereby certify: That I reported the taking of the  
 7 deposition of the witness, Javier Vazquez, commencing on  
 8 Tuesday, February 14, 2017, at 9:15 A.M.; That prior to  
 9 being examined, the witness was, by me, duly sworn to  
 10 testify to the truth; That thereafter I transcribed my  
 11 shorthand notes into typewriting and that the typewritten  
 12 transcript of said deposition is a complete, true, and  
 13 accurate record of said shorthand notes. I further certify  
 14 that I am not a relative or employee of any attorney or  
 15 counsel of any of the parties nor a relative or employee of  
 16 an attorney or counsel involved in said action, nor a person  
 17 financially interested in the action; that a request  
 18 [x] has [ ] has not been made to review the transcript.

19 IN WITNESS WHEREOF, I have hereunto set my  
 20 hand in the County of Clark, State of Nevada, this \_\_\_\_  
 21 day of \_\_\_\_\_.  
 22  
 23

24 SARAH PADILLA, CCR 929  
 25